

REMARKS

This Amendment and Response is submitted in response to the Office Action mailed 16 JANUARY 2004. Withdrawal of the rejection and reconsideration with an eye toward allowance is respectfully requested.

Claim Status

Claims 2-20 are pending after entry of the present amendment. Claims 1-22 stand rejected. Claims 1 and 21-22 are cancelled herein without prejudice or disclaimer towards presenting them in a related application. Claims 2-3, 6-8, 11-12, 15-17, and 19-20 are amended herein for technical clarity and/or proper dependency. A complete listing of all claims that are, or were in the application, along with an appropriate status identifier, is provided above in the section entitled "Amendments to the Claims". Markings are provided on claims amended in the present amendment.

Support for the above claim amendments can be found throughout the originally filed specification, drawings, and claims.

Claim Rejections – 35 U.S.C. §102

Claims 1, 2, 6-10, 12-14, 16-17, and 19-22 were rejected under 35 U.S.C. §102(e) as being anticipated by Bilger et. al. (U.S. Patent Number 6,317,835).

Applicant has cancelled claims 1 and 21-22. Claims 2, 6-10, 12-14 and 16-17 have been amended to depend from Claim 15, discussed below. Applicant has amended claim 19 to recite "chip on glass technology," which the Examiner concedes is not taught by Bilger (see Office Action, page 5). Claim 20 depends from and includes all limitations of amended claim 19.

Accordingly, Applicant submits that the 35 U.S.C. §102(e) rejection over Bilger is moot.

Claim Rejections – 35 U.S.C. §103

Claims 3-5 were rejected under 35 U.S.C. §103(a) as being unpatentable over Bilger et. al. (U.S. Patent Number 6,317,835). Applicant has amended claims 3-5 to depend from and include all limitations of Applicant's amended claim 15 including "a housing enclosing the encrypting circuit and the link, the housing formed at least partially using chip-on-glass technology". Accordingly, Applicant submits that the rejection over Bilger is moot. Applicant further notes that the Examiner has taken Official Notice that four wire and seven wire technology touch pads are well known in the art. Applicant respectfully requests that, if the Examiner maintains any rejection in view of this Official Notice, that the Examiner provide documentary evidence to support the rejection and Notice.

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Claim 11 was rejected under 35 U.S.C. §103(a) as being unpatentable over Bilger in view of Coli (U.S. Patent Number 5,452,355). Applicant has amended claim 11 to depend from and include all limitations of Applicant's Claim 15, discussed below. Accordingly, Applicant submits that the 35 U.S.C. §103(a) rejection over Bilger in view of Coli is moot.

Claim 15 was rejected under 35 U.S.C. §103(a) as being unpatentable over Bilger in view of Tsuji et. al. (U.S. Patent Number 5,821,622). Applicant respectfully submits that there is no proper motivation to combine the teachings of the references. Further, Applicant submits that the references, taken alone or in combination, fail to teach or disclose "a housing enclosing the encrypting circuit and the link, the housing formed at least partially using chip-on-glass technology".

Bilger is directed toward a PIN entry device (PED) including a microprocessor (see col. 2, lines 10-15). The microprocessor may operate in an encrypted mode whereby it accumulates several keystrokes without sending these to the application program. Instead, it waits for the ENTER key to be pressed, and then performs an encryption algorithm on accumulated inputs (see col. 2, lines 25-29). The Examiner concedes that Bilger does not disclose chip-on-glass technology (see Office Action, page 5).

Tsuji is directed toward a liquid crystal display device including a plurality of address wiring lines formed of an Mo-W alloy (see abstract). Tsuji discloses that "in the liquid crystal display device having the above-described structure, each address electrode pad and each data electrode pad are made of the same Mo-W alloy as that of the gate electrode, and therefore, for example, during the packaging of COG (chip on glass), the joint between these electrode pads and ICs used for image pick-up signal, connected thereto, is strengthened, thereby achieving a high reliability" (see col. 23, lines 60-67).

Applicant respectfully submits that there is not a proper motivation to combine the references. The Examiner suggests that the motivation would be because COG technology saves space since the display drivers that help turn screen's pixels on and off don't have to be housed in separate microchips (see Office Action, page 5). Further, the Examiner suggests that the motivation would be that COG reduces a mounting area and is better handling high speed or high frequency signals (see Office Action, page 5). The Examiner further states that the motivation would be that COG technology is cost effective over COB because much less IC's are required (see Office Action, page 5). Applicant respectfully submits that the advantages of COG technology described by the Examiner are not supported by any statements or disclosure in the cited art. Specifically, Applicant submits that Tsuji does not disclose these features of COG technology. Tsuji at most has disclosed that, during COG packaging, the joint between electrode pads made using a Mo-W alloy and ICs used for image pick-up signal is strengthened. Accordingly, Tsuji at most motivates the use of COG packaging to strengthen a joint between a Mo-W alloy electrode and an integrated circuit. Applicant respectfully submits that Tsuji does not motivate the use of COG technology for the formation of a housing to enclose a circuit for encrypting an identifier and a link between the circuit and a pad for entering the identifier, as recited in Applicant's independent claim 15. Accordingly, Applicant respectfully submits that proper motivation to combine the references is

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lacking. "There must be some reason, suggestion, or motivation found in the prior art whereby a person of ordinary skill in the field of the invention would make the combination. That knowledge cannot come from the applicant's invention itself" *In re Oetiker*, 24 USPQ2d 1443,1446 (CAFC 1992).

Further, Applicant respectfully submits that the references, taken separately or in combination, fail to disclose or suggest "a housing enclosing the encrypting circuit and the link, the housing formed at least partially using chip-on-glass technology". The Examiner concedes that Bilger does not disclose such a housing formed using chip-on-glass technology. Applicant further submits that Tsuji at most discloses a Mo-W alloy electrode bonded to an IC packaged using chip-on-glass technology. Tsuji does not disclose a housing as recited in Applicant's claim 15.

Accordingly, Applicant submits that Claim 15 is patentable over Bilger in view of Tsuji.

Claim 18 was rejected under 35 U.S.C. §103(a) as being unpatentable over Bilger in view of Coli and further in view of Tsuji. Claim 18 recites "a housing, resistant to access and at least partially of chip-on-glass technology, in which the link and encrypting circuit are embedded". As stated above with regard to claim 15, Applicant respectfully submits that Bilger and Tsuji fail to disclose, teach, or suggest this limitation. The Examiner concedes that Coli fails to disclose chip-on-glass technology.

Accordingly, Applicant respectfully submits that Claim 18 is patentable over Bilger in view of Coli in further view of Tsuji.

CONCLUSION

Prompt and favorable consideration of this Amendment and Response is respectfully requested. If the Examiner believes, for any reason, that personal communication will expedite prosecution of the application, the Examiner is invited to call the undersigned at (415) 781-1989.

Respectfully submitted,
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